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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO

MARCI PATERA,

Plaintiff,

vs.

CITIBANK N.A., a national banking
association; CITIMORTGAGE, Inc., a
corporation; et al. and Does 1-25,

Defendants,

Case No. 3:14-cv-04533-JSC

**JOINT STIPULATION TO EXTEND
DATE FOR INITIAL DISCLOSURES AND
TO CONTINUE HEARING ON
DEFENDANTS' MOTION TO DISMISS
COMPLAINT**

Hearing:

Date: January 15, 2015

Time: 8:30 a.m.

Courtroom: F, 15th Floor

Plaintiff MARCI PATERA ("Plaintiff") and Defendants CITIMORTGAGE, INC. and CITIBANK, N.A. (collectively, "Defendants"), by and through their respective counsel, hereby stipulate and agree as follows:

1. WHEREAS, on December 24, 2014, counsels for Plaintiff and Defendants participated in a Rule 26(f) conference;

2. WHEREAS, pursuant to Rule 26(a)(1)(C), unless otherwise stipulated by the parties or ordered by the Court, initial disclosures are due within 14 days of the Rule 26(f) conference, or January 7, 2014;

3. WHEREAS, the hearing on Defendants' Motion to Dismiss the Complaint ("MTD") is currently scheduled for January 15, 2015;

1 4. WHEREAS, due to the volume of documents and due to the Holidays, Defendants
2 will need more than 14 days to complete their initial disclosures; and

3 5. WHEREAS, Plaintiff will agree to extending the initial disclosure date, however,
4 would like to review any initial disclosure at least 14 days in advance of the hearing on the
5 MTD.

6 IT IS THEREFORE STIPULATED AND AGREED, by and among Plaintiff and
7 Defendants, as follows:

8 1. The deadline for the parties to make initial disclosures under Rule 26 shall be
9 extended, from January 7, 2014 to January 21, 2014; and

10 2. The hearing on the MTD, should be accordingly continued, upon agreement and
11 consent of the Court, from January 15, 2015 to February 5, 2015;

12 3. The parties will, through the filing of this Joint Stipulation, petition the Court for
13 permission to continue the hearing on the MTD.

14 Respectfully submitted,

15 LAW OFFICES OF PETER L. KUTRUBES

16 Dated: January 7, 2015

17 By: */s/ Peter Kutrubes*

18 PETER L. KUTRUBES
19 STEPHEN P. LIN, Of Counsel
20 Attorneys for Plaintiff MARCI PATERA

21 PITE DUNCAN, LLP

22 Dated: January 7, 2015

23 By: */s/ Cuong Nguyen*

24 CHRISTOPHER L. PETERSON
25 CUONG M. NGUYEN
26 Attorneys for Defendants CITIMORTGAGE, INC.
27 and CITIBANK, N.A.

28 Plaintiff shall file consent or declination to the Court's jurisdiction by January 15, 2015

Dated: 1/8/2015

